

Methodology for Identifying Unavoidable Impacts Associated with of Developing the Dry Lake Solar Energy Zone

Identification of the unavoidable impacts is the first step in developing a Regional Mitigation Plan for the Dry Lake Solar Energy Zone (SEZ). The overall process was presented at the September 2012 stakeholder workshop and is found on page 4 of the Solar Regional Mitigation Planning (SRMP) - Frequently Asked Questions. *Unavoidable impacts* are defined as those impacts that cannot be mitigated on-site by either avoiding the impact by restricting the timing and/or location of development, or by minimizing the impacts by requiring design features and/or best management practices.

The Solar Programmatic Environmental Impact Statement (PEIS) contains a description of the affected environment and the impacts expected from development of the Dry Lake Solar Energy Zone (SEZ). It also includes an explanation of the assumptions about the nature of development used to derive impacts, and a description of design features that can be applied to minimize impacts.

In order to identify the unavoidable impacts, an Interdisciplinary Team (IDT) of resource specialists from the BLM Southern Nevada District was formed (roster attached). The initial IDT meeting occurred in September, 2012. At this meeting, IDT members were given the task of developing a preliminary list of unavoidable impacts for consideration by stakeholders. The process the IDT members followed (independently) was as follows:

1. Summarize the impacts described in the Solar PEIS for each resource category
2. Summarize the measures described in the Solar PEIS that can be taken to avoid impacts on-site (within the boundary of the SEZ).
3. Summarize the measures described in the Solar PEIS that can be taken to minimize impacts on-site.
4. Validate and, where additional data exists, append the information extracted from the Solar PEIS for the Dry Lake SEZ.
5. Make a preliminary determination of whether the impacts can be adequately mitigated on-site by either avoidance or minimization.

The results for each resource category were presented to and discussed by the full IDT at a meeting conducted in October, 2012. Where an unavoidable impact had been identified, the IDT member responsible for the resource prepared a more detailed explanation of how this conclusion was reached and a preliminary recommendation for how off-site mitigation might be accomplished.

The results of the full IDT meeting were used to create a summary table that was reviewed and discussed by the SRMP Project Team, including several resource specialists from Argonne National Laboratory who had prepared the Solar PEIS. The Project Team made some changes with respect to the description of impacts to resources and in the determinations of whether impacts could be adequately mitigated on-site. The amended table was posted on the project web-site and presented at the October stakeholder meeting for review and comment. During this meeting, the BLM received feedback from stakeholders that the table wasn't detailed enough to support full discussion of some resources. The BLM is addressing these comments through additional revisions to the table.